

Complainants will produce documents responsive to this request and provide the following additional information:

Alliance: Alliance requires all employees to be familiar with NESC standards and industry practice. Complainant provides employees with a safety manual which they are required to follow. Additionally, Complainant holds monthly safety meetings to further supplement training for employees.

Comcast: Comcast contracts the services of contractors that are experienced in NESC compliance. Additionally, during interviews with potential employees, Comcast discusses qualifications and training related matters. Comcast supplements employees' existing training with additional periodic in-house training programs, as well as on the job training. Contractors and employees are required to be familiar with NESC standards and industry practice.

WEHCO: WEHCO requires employees to enroll in and attend correspondence courses offered by the National Cable Television Institute ("NCTI"). Additionally, WEHCO provides on-site training to new technicians by pairing new technicians with senior technicians for ride-alongs during the initial employment phase.

Employees are required to be familiar with and to follow NESC standards as well as industry practice.

Suddenlink: Suddenlink requires contractors to comply with NESC standards pursuant to the express terms contained in contracts between the parties.

Additionally, Suddenlink requires contractors to provide it with information regarding the regularly scheduled safety meetings held by contractors and

subcontractors. In addition, Suddenlink requires contractors to meet certain minimum standards.

INTERROGATORY NO. 34: Identify all documents relating to every inspection, survey, audit, count or inventory ever conducted by you or on your behalf relating to your Cable Plant.

RESPONSE: Complainants object on the grounds that this request is overly broad and not limited in time. Subject to the foregoing objections, Complainants will produce documents responsive to this request.

INTERROGATORY NO. 35: Identify and describe all instances where you contend EAI denied you access to any pole or structure owned or controlled by EAI, whether you contend any such denials were unjust and unreasonable, and the basis for your contentions.

RESPONSE: Complainants object on the grounds that this information is equally available elsewhere. The Complaint and accompanying documentation sets forth the circumstances under which Entergy denied access to the Complainants.

Complainants also object on the grounds that the question is not limited in time or scope. Subject to these objections, Complainants will produce responsive documents.

REQUEST FOR PRODUCTION NO. 1: Produce all documents and tangible objects of every kind that you intend to introduce in evidence or otherwise rely on at the formal hearing of this proceeding before the Administrative Law Judge.

RESPONSE: Complainants object to this question on the grounds that this request purports to require Complainants to identify their exhibit list in advance of the date set forth in the ALJ's April 20, 2006 Order. Complainants further object on the grounds that they have not yet completed discovery and is unable at this juncture to identify the documents and tangible objects they will introduce into evidence. Subject to these objections, Complainants states that they may introduce any of the exhibits attached to their Complaint and Reply.

REQUEST FOR PRODUCTION NO.2: Produce all documents and tangible objects of every kind in your possession or under your control relating to the issues to be addressed at the formal hearing before the Administrative Law Judge which are contained in the Hearing Designation Order adopted in this docket on March 1, 2006, DA 06-494.

RESPONSE: Complainants object. This interrogatory is overly broad and does not specify with any particularity the documents it asks Complainants to produce. Subject to these objections, Complainants will produce documents responsive to this request.

REQUEST FOR PRODUCTION NO. 3: Produce all documents relating to every communication identified in your responses to Interrogatories Nos. 7, 8 and 9.

RESPONSE: See objections and responses to Interrogatories Nos. 7, 8 and 9.

REQUEST FOR PRODUCTION NO. 4: Produce all documents identified in your response to Interrogatory No. 10.

RESPONSE: See response to Interrogatory No. 10.

REQUEST FOR PRODUCTION NO. 5: Produce all documents identified in your responses to Interrogatory Nos. 11 and 13.

RESPONSE: Complainants object to the production of the documents identified in Interrogatory No. 11 on the grounds that it would be burdensome and oppressive to review its entire system to determine manufacturers specifications for every inch of Cable Plant dating back to initial installation. Further, Complainants object on the grounds that the manufacturing specifications are not identified as issues designated for hearing and are not related to issues designated for hearing.

REQUEST FOR PRODUCTION NO. 6: Produce all documents identified in your responses to Interrogatory Nos. 14 and 15.

RESPONSE: See objections and responses to Interrogatories No. 14 and 15.

REQUEST FOR PRODUCTION NO. 7: Produce all documents relating to your responses to Interrogatory Nos. 16 and 19.

RESPONSE: See objections and responses to Interrogatories Nos. 16 and 19.

REQUEST FOR PRODUCTION NO. 8: Produce all documents relating to your response to Interrogatory No. 21.

RESPONSE: See objections and response to Interrogatory No. 21.

REQUEST FOR PRODUCTION NO. 9: Produce all documents relating to your response to Interrogatory No. 23.

RESPONSE: See objections and response to Interrogatory No. 23.

REQUEST FOR PRODUCTION NO. 10: Produce all documents identified in your response to Interrogatory No. 25.

RESPONSE: See objections and response to Interrogatory No. 25.

REQUEST FOR PRODUCTION NO. 11: Produce all documents relating to your response to Interrogatory No. 26.

RESPONSE: See objections and response to Interrogatory No. 26.

REQUEST FOR PRODUCTION NO. 12: Produce all documents relating to your response to Interrogatory No. 28.

RESPONSE: See objections and response to Interrogatory No. 28.

REQUEST FOR PRODUCTION NO. 13: Produce all documents relating to or identified in your responses to Interrogatory Nos. 29 and 30.

RESPONSE: See objections and responses to Interrogatories Nos. 29 and 30.

REQUEST FOR PRODUCTION NO. 14: Produce all documents relating to or identified in your response to Interrogatory No. 34.

RESPONSE: See objections and response to Interrogatory No. 34.

REQUEST FOR PRODUCTION NO. 15: Produce all documents relating to your response to Interrogatory No. 35.

RESPONSE: See objections and response to Interrogatory No. 35.

REQUEST FOR PRODUCTION NO. 16: Produce all documents which you maintain or contend evidence permission, approval or consent for you to attach guy wires to anchors owned or controlled by EAI.

RESPONSE: Complainants object on the grounds that it is oppressive and burdensome to require it to produce every permission, approval and consent dating back to the initial installation of the system. Moreover, many, if not all, of the

anchor permissions, approvals and consents were made orally without written documentation. Subject to these objections, Complainants will produce documents responsive to this request.

REQUEST FOR PRODUCTION NO. 17: Produce all documents which constitute or relate to your construction manuals or books, procedures, policies, standards, specifications, or field practices followed by you to make any attachment of coax or fiber cable, messenger, guy wire, anchor, bracket, bolt, apparatus, power supply, electronic device, or any other equipment or wire associated with attachment of the foregoing to the poles, structures or property owned or controlled by EAI in areas served by you, including without limitation all drafts, revisions, or amendments of these documents.

RESPONSE: Complainants object on the grounds that this interrogatory is not relevant. Complainants' construction practices are not an issue designated for hearing and are not related to the issues designated for hearing. As a result, Entergy's request is not relevant and is beyond the scope of the above-captioned proceeding. Subject to these objections, Complainants will provide documents responsive to this request.

REQUEST FOR PRODUCTION NO. 18: Produce all documents which constitute or relate to training materials or manuals, safety regulations or codes, internal training or safety manuals, training or safety policies or procedures utilized or implemented by you in making any attachment of coax or fiber cable, messenger, guy wire, anchor bracket, bolt, apparatus, power supply, electronic device, or any

other equipment or wire associated with attachment of the foregoing to poles, structures, or property owned or controlled by EAI in areas served by you, including without limitation all drafts, revisions and amendments of these documents.

RESPONSE: Complainants object on the grounds that this interrogatory is not relevant. Complainants' training practices are not an issue designated for hearing and are not related to the issues designated for hearing. As a result, Entergy's request is not relevant and is beyond the scope of the above-captioned proceeding. Subject to these objections, Complainant will provide documents responsive to this request.

REQUEST FOR PRODUCTION NO. 19: Produce all documents which constitute or relate to applications for permits, notification of any upgrade, rebuild, overlash, modernization, modification, replacement, or removal submitted by you to EAI for any attachment of your Cable Plant, including without limitation all construction detail drawings, maps, studies, diagrams, schematics or depictions.

RESPONSE: Complainants object to this request on the grounds that this information is equally available from Entergy's own files. Subject to the foregoing objections, Complainants will produce documents responsive to this request.

REQUEST FOR PRODUCTION NO. 20: Produce all permits for every attachment of your Cable Plant approved or issued by EAI.

RESPONSE: Complainants object to this requests on the grounds that it is duplicative of Request No. 19. Complainants also object on the grounds that these

documents are equally available from Entergy's own files. Subject to these objections, Complainants will produce documents responsive to this request.

REQUEST FOR PRODUCTION NO. 21: Produce all documents which constitute or relate to applications for permits submitted by you or on your behalf to EAI which you contend were unreasonably denied or refused by EAI.

RESPONSE: Complainants object on the grounds that the documents requested are duplicative of those requested in Request No. 19. Subject to these objections, Complainants will produce documents responsive to this request.

REQUEST FOR PRODUCTION NO. 22: Produce all documents in your possession or under your control as of December 31, 2001 that relate to or identify attachment of Cable Plant to poles, structures or property owned or controlled by EAI, including without limitation all construction strand maps, facilities maps, diagrams, schematics, drawings, or other materials.

RESPONSE: Complainants object on the grounds that this request, combined with Request No. 23, is oppressive and burdensome in that it seeks to impose arbitrary divisions in Complainants' records that otherwise do not exist. In addition, this request is duplicative of Request No. 4. Subject to the foregoing objections, Complainants will produce documents responsive to this request.

REQUEST FOR PRODUCTION NO. 23: Other than documents furnished to you by EAI or USS, and documents produced in response to Request No. 22, produce all documents in your possession or under your control as of this date that relate to or identify attachment of Cable Plant to poles, structures or property owned or

controlled by EAI including without limitation construction strand maps, facilities maps, diagrams, schematics, drawings, or other materials.

RESPONSE: See objections and response to Request no. 22.

REQUEST FOR PRODUCTION NO. 24: Produce all documents furnished to you by EAI or USS relating to attachment of Cable Plant to poles, structures or property owned or controlled by EAI, including without limitation maps, diagrams, schematics, drawings, depictions, surveys, audits or reports.

RESPONSE: Complainants object to this request on the grounds that the documents are equally available from Entergy's own files. Complainants also object on the grounds that this request is duplicative of Request No. 4. Subject to the foregoing objections, Complainants will produce documents responsive to this request.

REQUEST FOR PRODUCTION NO. 25: Produce all documents relating to any studies, reports, tests, or analyses performed by you or on your behalf relating to every attachment of Cable Plant to poles, structures or property owned or controlled by EAI, including without limitation engineering studies or documentation to evaluate wind and weight pole loading.

RESPONSE: Complainants object on the grounds that it is oppressive and burdensome to require it to produce every report, test or analysis dating back to the initial installation of the system. In addition, this request seeks documents duplicative of those requested in Request No. 19. Subject to these objections, Complainants will produce documents responsive to this request.

REQUEST FOR PRODUCTION NO. 26: Produce all documents relating to agreements between you and every entity other than EAI allowing you to attach coax or fiber cable, messenger, guy wire, anchor, bracket, bolt, apparatus, power supply, electronic device, or any other equipment or wire associated with attachment of the foregoing to any pole or structure belong to that entity including without limitation all drafts, revisions, or amendments of such agreements.

RESPONSE: Complainants object on the grounds that this request is oppressive and burdensome in that it is not limited in either geographical scope or time. Complainants also object on the grounds that this request is not relevant. Whether other entities' pole attachment agreements are just or reasonable are not at issue in this hearing.

REQUEST FOR PRODUCTION NO. 27: Produce all documents relating to agreements or contracts between you and every agent, contractor, subcontractor, consultant, or other person or entity who has ever performed or provided any work, labor, or service relating to attachments of Cable Plant, installation, upgrades, rebuilds, overlashing, modernizations, modifications, replacement of Cable Plant, or safety violations reported to you by EAI or USS.

RESPONSE: Complainants object on the grounds that this request is oppressive and burdensome in that it is not limited in either geographical scope or time. Complainants also object on the grounds that this request is not relevant. The substance of Complainants' agent, contractor and subcontractor agreements are not designated for hearing and are not related to issues designated for hearing.

REQUEST FOR PRODUCTION NO. 28: Produce all documents relating to every agreement, contract, instrument, or other documentation for the purchase or sale of any Cable Plant involved in this proceeding or the rights to provide cable services within any geographic area with attachment of Cable Plant involved in this proceeding.

RESPONSE: Complainants object on the grounds that this request is oppressive and burdensome in that it is not limited in time. Complainants also object on the grounds that this request is not relevant. The ownership of the cable television systems and the right to provide cable services in any particular geographic area is neither in dispute, designated for hearing, nor related to issues designated for hearing.

REQUEST FOR PRODUCTION NO. 29: Produce all documents relating to agreements between you and Utility Consultants, Inc. ("UCI") or any other agent, contractor, subcontractor or consultant utilized for work on poles, structures, or property owned or controlled by EAI, including but not limited to, contracts, exhibits, schedules, attachments, diagrams, addendums, and modifications.

RESPONSE: Complainants object on the grounds that this request is duplicative of Request No. 27. See objections and response to Request No. 27.

ARKANSAS CABLE
TELECOMMUNICATIONS ASSOCIATION;
COMCAST OF ARKANSAS, INC.; BUFORD
COMMUNICATIONS I, L.P. D/B/A
ALLIANCE COMMUNICATIONS NETWORK;

WEHCO VIDEO, INC.; TCA CABLE
PARTNERS D/B/A COX COMMUNICATIONS

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July 20, 2006

Its Attorneys

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

<hr/>)	
In the Matter of)	
)	
ARKANSAS CABLE)	
TELECOMMUNICATIONS)	EB Docket No. 06-53
ASSOCIATION; COMCAST OF)	
ARKANSAS, INC.; BUFORD)	
COMMUNICATIONS I, L.P. d/b/a)	
ALLIANCE COMMUNICATIONS)	EB-05-MD-004
NETWORK; WEHCO VIDEO, INC.;)	
TCA CABLE PARTNERS d/b/a COX)	
COMMUNICATIONS; and CEBRIDGE)	
ACQUISITION, L.P., d/b/a SUDDENLINK)	
COMMUNICATIONS)	
)	
<i>Complainants,</i>)	
)	
v.)	
)	
ENTERGY ARKANSAS, INC.,)	
)	
<i>Respondent.</i>		
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VERIFICATION OF GENEVIEVE D. SAPIR

I, Genevieve D. Sapir, attorney for Complainants in the above-captioned matter hereby declare under the penalty of perjury of the laws of the United States that the facts contained in these answers to interrogatories and requests for production of documents are true and accurate to the best of my knowledge, information and belief.

Signed: Genevieve D. Sapir

Date: July 20, 2004

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)

ARKANSAS CABLE)

TELECOMMUNICATIONS)

ASSOCIATION; COMCAST OF)

ARKANSAS, INC.; BUFORD)

COMMUNICATIONS I, L.P. d/b/a)

ALLIANCE COMMUNICATIONS)

NETWORK; WEHCO VIDEO, INC.;)

TCA CABLE PARTNERS d/b/a COX)

COMMUNICATIONS; and CEBRIDGE)

ACQUISITION, L.P., d/b/a SUDDENLINK)

COMMUNICATIONS)

Complainants,)

v.)

ENTERGY ARKANSAS, INC.,)

Respondent.)

EB Docket No. 06-53

EB-05-MD-004

VERIFICATION OF ARL COPE

I, Arl Cope, Vice President of Operations for Alliance Communications Network, hereby declare under the penalty of perjury of the laws of the United States that the facts contained in these answers to interrogatories regarding Alliance Communications Network are true and accurate to the best of my knowledge, information and belief.

Signed: 

Date: 7-20-06

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
ARKANSAS CABLE)	
TELECOMMUNICATIONS)	EB Docket No. 06-53
ASSOCIATION; COMCAST OF)	
ARKANSAS, INC.; BUFORD)	
COMMUNICATIONS I, L.P. d/b/a)	
ALLIANCE COMMUNICATIONS)	EB-05-MD-004
NETWORK; WEHCO VIDEO, INC.;)	
TCA CABLE PARTNERS d/b/a COX)	
COMMUNICATIONS; and CEBRIDGE)	
ACQUISITION, L.P., d/b/a SUDDENLINK)	
COMMUNICATIONS)	
)	
Complainants,)	
)	
v.)	
)	
ENTERGY ARKANSAS, INC.,)	
)	
Respondent.)	

VERIFICATION OF MARC BILLINGSLEY

I, Marc Billingsley, Engineering Manager for the Arkansas Region of Comcast Cable Communications, Inc. ("Comcast"), hereby declare under the penalty of perjury of the laws of the United States that the facts contained in these answers to interrogatories regarding Comcast are true and accurate to the best of my knowledge, information and belief.

Signed: 

Date: 7-20-06

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)	
)	
ARKANSAS CABLE)	
TELECOMMUNICATIONS)	EB Docket No. 06-53
ASSOCIATION; COMCAST OF)	
ARKANSAS, INC.; BUFORD)	
COMMUNICATIONS I, L.P. d/b/a)	
ALLIANCE COMMUNICATIONS)	EB-05-MD-004
NETWORK; WEHCO VIDEO, INC.;)	
TCA CABLE PARTNERS d/b/a COX)	
COMMUNICATIONS; and CEBRIDGE ACQUISITION, L.P.,)	
d/b/a SUDDENLINK COMMUNICATIONS)	
)	
Complainants,)	
)	
v.)	
)	
ENTERGY ARKANSAS, INC.,)	
)	
Respondent.)	

VERIFICATION OF JEFF GOULD

I, Jeff Gould, Director of Engineering for Suddenlink Communications, hereby declare under the penalty of perjury of the laws of the United States that the facts contained in these answers to interrogatories regarding Suddenlink Communications are true and accurate to the best of my knowledge, information and belief.

Signed: Jeff Gould
Date: 7/30/2006

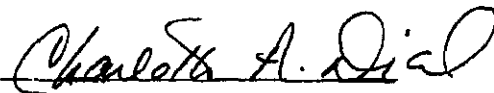
**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
ARKANSAS CABLE)	
TELECOMMUNICATIONS)	EB Docket No. 06-53
ASSOCIATION; COMCAST OF)	
ARKANSAS, INC.; BUFORD)	
COMMUNICATIONS I, L.P. d/b/a)	
ALLIANCE COMMUNICATIONS)	EB-05-MD-004
NETWORK; WEHCO VIDEO, INC.;)	
TCA CABLE PARTNERS d/b/a COX)	
COMMUNICATIONS; and CEBRIDGE)	
ACQUISITION, L.P., d/b/a SUDDENLINK)	
COMMUNICATIONS)	
)	
Complainants,)	
)	
v.)	
)	
ENTERGY ARKANSAS, INC.,)	
)	
Respondent.)	

VERIFICATION OF CHARLOTTE DIAL

I, Charlotte Dial, Vice President of Administration for WEHCO Video, Inc. ("WEHCO"), hereby declare under the penalty of perjury of the laws of the United States that the facts contained in these answers to interrogatories regarding WEHCO are true and accurate to the best of my knowledge, information and belief.

Signed:



Date:

7/20/06

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
ARKANSAS CABLE)	
TELECOMMUNICATIONS)	EB Docket No. 06-53
ASSOCIATION; COMCAST OF)	
ARKANSAS, INC.; BUFORD)	
COMMUNICATIONS I, L.P. d/b/a)	
ALLIANCE COMMUNICATIONS)	EB-05-MD-004
NETWORK; WEHCO VIDEO, INC.;)	
TCA CABLE PARTNERS d/b/a COX)	
COMMUNICATIONS; and CEBRIDGE)	
ACQUISITION, L.P., d/b/a SUDDENLINK)	
COMMUNICATIONS)	
)	
<i>Complainants,</i>)	
)	
v.)	
)	
ENTERGY ARKANSAS, INC.,)	
)	
<i>Respondent.</i>)	
)	

**COMPLAINANT ACTA'S RESPONSES TO ENTERGY'S FIRST
INTERROGATORIES AND REQUESTS FOR PRODUCTION**

Complainant Arkansas Cable Telecommunications Association

("ACTA" or "Complainant") hereby responds to Entergy's First Interrogatories and
Requests for Production as follows:

Statement

This responding party and its attorneys have not completed discovery in this action. All of the responses contained herein are based solely upon information presently available to and specifically known by the party and its attorneys after diligent and good faith investigation. As discovery continues, witnesses, facts, and evidence may be discovered which are not set forth herein, but which may have been responsive to one or more of the interrogatories had the information been known at this time.

Facts and evidence now known may be imperfectly understood, and the relevance or consequences of such facts and information may be imperfectly understood. Accordingly, some facts and evidence now known may not, in good faith, be included in the following responses.

Complainant anticipates that further discovery, independent investigation, legal research and analysis will supply additional facts, may supply new meaning to known facts, and may establish entirely new facts or conclusions and legal contentions, all of which may lead to substantial modification to the discovery responses herein. The following interrogatory responses are given without prejudice to Complainant's right to produce witnesses and evidence, the significance of which are only subsequently discovered. Complainant therefore reserves the right to modify any or all responses made herein as additional facts are obtained, analyses are made, legal research is completed and contentions are developed. The responses contained herein are made in a good faith effort to supply such factual information as is presently known, but should in no way be interpreted

to prejudice the rights of Complainant in relation to future discovery, research, or analysis.

Finally, Entergy's requests are in some cases duplicative of each other, and each document identified may not be responsive only to the Interrogatory or Request marked; in many cases, documents may be responsive to one or more additional Interrogatory or Request.

GENERAL OBJECTIONS

Complainant asserts the following General Objections, which are incorporated by reference into each specific response below:

1. Complainant objects to the Interrogatories, including the "Instructions" and "Definitions," to the extent that they seek to impose burdens or duties upon Complainant that exceed the requirements and permissible scope of discovery under the FCC's Rules and Procedures governing hearings and the Orders, including but not limited to the Hearing Designation Order and Judge Steinberg's April 20, 2005 Procedural Order.

2. Complainant objects to the Interrogatories to the extent that they seek information reflecting communication protected from disclosure by the attorney-client privilege and/or material protected by the work-product doctrine or any other applicable privilege.

3. Complainant objects to the Interrogatories to the extent that they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

4. Complainant objects to the Interrogatories to the extent that they seek proprietary and/or confidential information and/or trade secrets.

5. Complainant objects to the Interrogatories to the extent that they are vague, overly broad, and/or confusing.

6. Complainant objects to the Interrogatories to the extent that they are unduly burdensome, unreasonably cumulative and duplicative, or call for information already in Entergy's (or its agents', representatives' and contractors') possession.

7. Complainant objects to the Interrogatories to the extent that they are intended solely for the purpose of annoyance, embarrassment, harassment, and/or oppression.

8. Complainant objects to the Interrogatories to the extent that they seek information that should more properly be obtained through deposition testimony.

9. Complainant anticipates discovering additional information and materials during the discovery process, which may be responsive to the discovery

requests. Complainant expressly reserves the right to rely on such information and materials if and when they are discovered after the date of this response.

10. Complainant expressly reserves the right to supplement these objections.

11. These General Objections are incorporated into each specific response below and all such responses shall be subject to the foregoing General Objections.

INTERROGATORY NO. 1: Identify the individuals who participated in responding to these interrogatories and requests for production and list the corresponding interrogatory or request for production for which they participated.

RESPONSE: See response to Interrogatory No. 1 of Complainants' response to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO. 2: Identify each individual you will or may call to testify as a fact witness at the formal hearing of this proceeding before the Administrative Law Judge or who will or may provide written testimony and state the subject matter on which each such witness will or may testify.

RESPONSE: See objections and response to Interrogatory No. 2 of Complainants' response to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO. 3: Identify to the best of your ability at this time each individual you will actually call to testify as a witness at the formal hearing of this proceeding before the Administrative Law Judge or who will actually provide written testimony so that their depositions can be timely noticed and completed by EAI in compliance with the Administrative Law Judge's order issued April 20, 2006, FCC 06M-09.

RESPONSE: See objections and response to Interrogatory No. 3 of Complainants' response to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO. 4: Identify each individual you will or may call to testify as an expert witness at the formal hearing of this proceeding before the Administrative Law Judge or will or may provide written testimony.

RESPONSE: See response to Interrogatory No. 4 of Complainants' response to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO. 5: Identify all individuals who have knowledge, information or documents relating to the issues to be addressed at the formal hearing before the Administrative Law Judge which are contained in the Hearing Designation Order adopted on March 1, 2006, DA 06-494.

RESPONSE: See objections and response to Interrogatory No. 5 of Complainants' response to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO. 6: Identify all individuals who were not identified in response to Interrogatory No. 5 who have knowledge, information or documents relating to facts, allegations, contentions or subject matter described in the pleadings in FCC Docket Nos.: EB-05-MD-004, EB 06-53.

RESPONSE: See objections and response to Interrogatory No. 6 of Complainants' response to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO. 7: Identify and describe every communication between you and any of your agents, contractors, subcontractors, employees, Complainants, members, other cable operators, other telecommunications operators, other telecommunications carriers, or any other entity relating to Utility Support Systems, Inc. ("USS"), safety inspections performed by USS, or safety violations reported by EAI or USS to any of the Complainants or their agents or contractors or subcontractors.

RESPONSE: See objections and response to Interrogatory No. 7 of Complainants' response to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

INTERROGATORY NO.8: Identify and describe every communication, not otherwise identified in response to Interrogatory No. 7, between you and any of your agents, contractors, subcontractors, employees, Complainants, members, other cable operators, other telecommunications carriers, or any other entity relating to any fact, allegation, contention, or subject matter described in the pleadings in FCC Docket Nos.: EB-05-MD-004, EB 06-53.

RESPONSE: See objections and response to Interrogatory No. 9 of Complainants' response to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

REQUEST FOR PRODUCTION NO. 1: Produce all documents and tangible objects of every kind that you intend to introduce into evidence or otherwise rely on at the formal hearing of this proceeding before the Administrative Law Judge.

RESPONSE: See objections and response to Request No. 1 of Complainants' response to Entergy Arkansas, Inc.'s First Interrogatories And Requests For Production To Certain Complainants.

REQUEST FOR PRODUCTION NO. 2: Produce all documents and tangible objects of every kind in your possession or under your control relating to the issues to be addressed at the formal hearing before the Administrative Law Judge which are contained in the Hearing Designation Order adopted on March 1, 2006, DA 06-494.